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PECERAL MARITIME COMM

September 3rd, 2003

Honorable Bryant L. Van Brakle Secretary Federal Maritime Commission 800 North Capitol Street, N.W. Washington, D.C. 20573

RE: Petition of National Customs Brokers and Forwarders

Association of America, Inc. for a Limited Exemption From Certain Tariff Requirements of the Shipping Act of 1984

Petition No. 08- P5-03

Dear Secretary Van Brakle:

I am **Aldo** Wrves, Vice-President/General Manager.

Cala Distribution, L.C. FMC License #17802N, an NVOCC with office headquartered in Miami, FL providing services through numerous agents in the Caribbean and Latin-American markets.

Costs associated with maintaining, filing, up keeping, and subscription costs:

- 1. Establishing a tariff website:\$900.00
- The annual cost of subscribing to a tariff publishing service: \$750.00 + \$1200.00 yearly average for maintaining and publishing required rates.
- 3. Number of hours and costs spent each month in maintaining the tariff **website** 'or making changes to **tariff: 10** hours, costing estimated at about: \$315.00
- 4. Costs assessed to persons seeking to access the tariff: None
- 5. Number of times shippers or other persons have accessed **tariff**: None, thus we do not recoup these associated expenses.



Presently we average about 0.5% of the company's costs that are related directly or indirectly through supervisory effort to rate tariff compliance.

Current/y 700% of all rates are separately negotiated with shippers as opposed to already being in our tariff.

The present rate tariffs requirements are not useful to our company or our customers for the following reasons:

Shippers don't access or rely on NVOCC rate tariffs.

Rates are negotiated with clients on a one to one basis, then published as required and agreed upon.

Flexibility is also needed and required because rates are negotiated with the steamship lines

Result of this change of being exempted will result in a cost savings from publishing and maintaining rate tariffs and would be passed along to our clients.

I, <u>Aldo Wrves</u> declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on: September 3rd, 2003.

Vice-President

Cala Distribution, L.C. FMC#: 17802N